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8 Facsimile: (510) 874-1460

9 Attorney for Defendant
10 John Morgan

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 OAKLAND DIVISION

14 UNITED STATES OF AMERICA,
15
16 Plaintiff,

17 vs.

18 TIFFANY TAYLOR, CHRISTOPHER
19 JOHNSON, JOHN MORGAN, KIM
20 DRAGO, and MICHAEL DOWNEY

21 Defendants.

Case No. CR-05-00651 CW

**STIPULATION AND ~~PROPOSED~~
ORDER EXCLUDING TIME FROM
JANUARY 30, 2006 TO MARCH 1, 2006
FROM THE SPEEDY TRIAL ACT
CALCULATION (18 U.S.C. §
3161(h)(8)(A))**

22 The United States of America, by and through its attorneys, Kevin Ryan, United States
23 Attorney for the Northern District of California, by Kirstin Ault, Assistant U.S. Attorney, and
24 defendants TIFFANY TAYLOR, CHRISTOPHER JOHNSON, JOHN MORGAN, KIM
25 DRAGO, and MICHAEL DOWNEY, and by their undersigned attorneys, hereby stipulate and
26 agree that the date on which the defendants' pretrial motions shall be served and filed shall be
27 continued from January 30, 2006 to March 1, 2006. The government's opposition shall be
28 served and filed on March 8, 2006, and any replies shall be served and filed on March 17, 2006.

1 A hearing on the motions shall be heard on or after March 22, 2006 or as directed by the Court.

2 The parties hereby stipulate and agree that the time between January 30, 2006 and
3 March 1, 2006 shall be excluded from the calculation of time in which the trial of the captioned
4 matter must commence pursuant to the Speedy Trial Act.

5 The grounds for this exclusion are that counsel for defendants require additional time to
6 consult with their clients in connection with the effective preparation of motions and other
7 matters related to the defense of the case and to allow for the continuity of counsel in this case,
8 which make it unreasonable to expect adequate preparation for pretrial proceedings or trial
9 within the time limits established by the Speedy Trial Act. The parties agree that the ends of
10 justice served by the exclusion of this time outweigh the best interests of the public and the
11 defendants in a speedy trial, all pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B)(iv).
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15

16 STIPULATED:

17 DATED: _____

18 DATED: 1/23/06

21 DATED: _____

23 DATED: _____

25 DATED: _____

KIRSTEN M. AULT
Assistant United States Attorney

DAVID W. SHAPIRO
Attorney for Defendant John Morgan

EUGENE ILLOVSKY
Attorney for Defendant Tiffany Taylor

RANDALL KNOX
Attorney for Defendant Christopher Johnson

SHANA KEATING
Attorney for Defendant Kim Drago

1 DATED: _____

JEROME MATTHEWS
Attorney for Defendant Michael Downey

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4 IT IS SO ORDERED:

5 DATED: _____

CLAUDIA WILKIN
United States District Judge

BOIES, SCHILLER & FLEXNER LLP
OAKLAND, CALIFORNIA

JAN-23-2006 11:49

P.02/02


1 A hearing on the motions shall be heard on or after March 22, 2006 or as directed by the Court.

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11 defendants in a speedy trial, all pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B)(iv).
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16 STIPULATED:

17 DATED: 1/23/06


KIRSTEN M. AULT
Assistant United States Attorney

18 DATED: 1/23/06


DAVID W. SHAPIRO
Attorney for Defendant John Morgan

20 DATED: _____

EUGENE ILLOVSKY
Attorney for Defendant Tiffany Taylor

22 DATED: _____

RANDALL KNOX
Attorney for Defendant Christopher Johnson

24 DATED: _____

SHANA KEATING
Attorney for Defendant Kim Drago

01/23/2006 10:10 FAX 925 946 9912

MORRISON & FOERSTER

002

Jan. 23. 2006 10:43AM

No. 1188 P. 3/4

SOIES, SCHILDER & FLEXNER LLP
OAKLAND, CALIFORNIA

1 A hearing on the motions shall be heard on or after March 22, 2006 or as directed by the Court.

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11 defendants in a speedy trial, all pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B)(iv).
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16 STIPULATED:

17 DATED: _____

18 DATED: 1/23/06

19 DATED: 1/23/06

20 DATED: _____

21 DATED: _____

KIRSTEN M. AULT
Assistant United States Attorney

DAVID W. SHAPIRO
Attorney for Defendant John Morgan

EUGENE ILLOVSKY
Attorney for Defendant Tiffany Taylor

RANDALL KNOX
Attorney for Defendant Christopher Johnson

SHANA KEATING
Attorney for Defendant Kim Drago

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STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME FROM JANUARY 30, 2006 TO MARCH 1, 2006 FROM THE SPEEDY TRIAL ACT CALCULATION (18 U.S.C. § 3161(h)(8)(A))

01/26/2006 05:24 FAX 415 765 7501

Randall Knox Law Office

No. 1188 P. 3/4

Jan. 23. 2006 10:45AM

BOIES, SCHILLER & FLEXNER LLP
OAKLAND, CALIFORNIA

1 A hearing on the motions shall be heard on or after March 22, 2006 or as directed by the Court.

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3 March 1, 2006 shall be excluded from the calculation of time in which the trial of the captioned
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11 defendants in a speedy trial, all pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B)(iv).
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16 STIPULATED:

17 DATED: _____

KIRSTEN M. AULT
Assistant United States Attorney

18 DATED: 1/23/06

DAVID W. SHAPIRO
Attorney for Defendant John Morgan

20 DATED: _____

EUGENE ILLOVSKY
Attorney for Defendant Tiffany Taylor

22 DATED: 1/30/06

RANDALL KNOX
Attorney for Defendant Christopher Johnson

24 DATED: _____

SHANA KEATING
Attorney for Defendant Kim Drago

Jan. 23. 2006 10:47AM

NO. 1100 P. 3/4

BOIES, SCHILLER & FLEXNER LLP
OAKLAND, CALIFORNIA

1 A hearing on the motions shall be heard on or after March 22, 2006 or as directed by the Court.

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9 within the time limits established by the Speedy Trial Act. The parties agree that the ends of
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11 defendants in a speedy trial, all pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B)(iv).
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16 STIPULATED:

17 DATED: _____

KIRSTEN M. AULT
Assistant United States Attorney

18 DATED: 1/23/06

DAVID W. SHAPIRO
Attorney for Defendant John Morgan

20 DATED: _____

EUGENE ILLOVSKY
Attorney for Defendant Tiffany Taylor

22 DATED: _____

RANDALL KNOX
Attorney for Defendant Christopher Johnson

24 DATED: 1/23/06

SHANNA KEATING
Attorney for Defendant Kim Drago

01/25/2006 13:00 FAX 5106373507

FED PUBLIC DEFENDER

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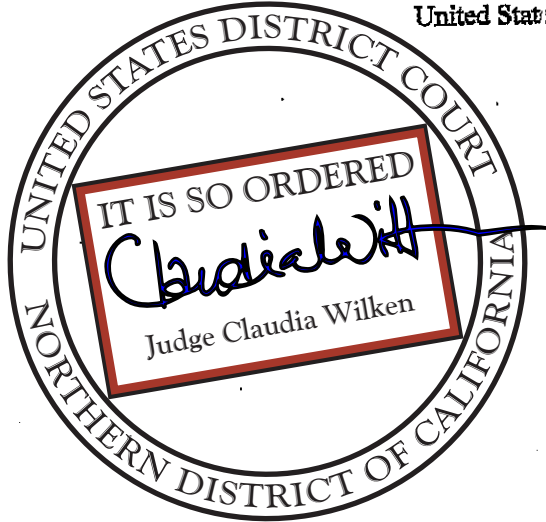
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No. 2140 P. 4

1 DATED: 1/25/06

 JEROME MATTHEWS

Attorney for Defendant Michael Downey

 2
 3 IT IS SO ORDERED: A HEARING ON THE MOTIONS WILL BE HELD ON
 4 MARCH 27, 2006, AT 2:00 P.M.
5 DATED: 1/31/06
 6 CLAUDIA WILKIN
 United States District Judge

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 SOIES, SCHILLER & FLEKNER LLP
 OAKLAND, CALIFORNIA